



# KOCZANOWICZ & HALE

Association of Sole Practitioners

DPH

Marlin D. Koczhanowicz

David P. Hale

March 27, 2014

Mr. Greg Nunley  
Great Valley Land Company  
1969 Hillman  
Tulare CA 93274

VIA ELECTRONIC AND FIRST CLASS MAIL

RE: Contact with City Staff

Dear Mr. Nunley:

On Tuesday, March 18, 2014, you received a call from Rob Hunt, the City's Community Development Director. He was responding to your message from the day before regarding the landscaping at the Tesori Subdivision and Rule 20A funds for utility undergrounding.

Mr. Hunt informed me that during the phone conversation you used profane language and inaccurately relayed the details of your contacts with Traci Myers, the Deputy Director. Your statements to Mr. Hunt included statements, which though not quoted exactly as the call was not recorded, were as follows:

- "You and Traci are Don's puppets and you can kiss my ass, in fact, you and the City of Tulare can go fuck yourselves".
- "You know what I am going to do? I am going to fuck the City of Tulare, I am not bonded for any of that utility work, only the interior frontages, so I am going to finish Ribola and Paseo Del Lago, and leave the City to complete Mooney, they can have my fucking \$700K bond".
- "I have already talked to Darlene Mata and my attorney, and that's what I am going to do".

You sent me an email denying Mr. Hunt's accounting of the incident before this letter was even finished, which made it clear that you had knowledge of an email sent by Mr. Dorman to the City Council. I recognize that you have a different version of the incident, but that only magnifies the need for the steps set forth below.

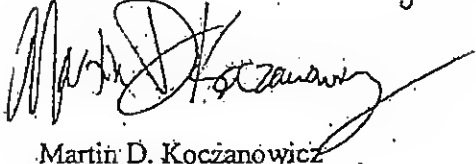
You have in the past, without any factual basis, accused staff of lying and have been rude and abusive. Your latest incident with Mr. Hunt has crossed the line and cannot be repeated. California Civil Code Section 527.8 mandates that an employer obtain a restraining order to protect its employees from undue harassment by third parties. I am hopeful that such a step will not be necessary in this instance; however, in order to ensure that all communications are verifiable, and to prevent any potential future incidents, effective immediately, please only

contact City staff in writing, via emails, fax or regular mail. No more telephone calls will be accepted by City staff. Should you require in person visits to City Hall, please set up an appointment in advance so more than one staff member can be present at the in-person meeting.

Again, I am hopeful that no other incidents will occur and that by following the above routine all involved can have assurances of civil contacts and accurate exchange of information. Please feel free to contact me if you have any questions or require further explanation.

Sincerely,

by *SL*

A handwritten signature in dark ink, appearing to read "Martin D. Koczanowicz", with a long, sweeping horizontal line extending to the right.

Martin D. Koczanowicz  
City Attorney

Cc.: Mayor, Council Members  
Don Dorman  
Rob Hunt